

IN RE:	:	
THERESA ELIZABETH OLIVER	:	CASE NO. 1-19-02513-HWV
aka THERESA E. CORRELL	:	
aka THERESA E. LONG	:	CHAPTER 13
Debtor	:	
	:	
FREEDOM MORTGAGE CORPORATON	:	
Movant	:	
	:	
v.	:	
	:	
THERESA ELIZABETH OLIVER	:	
aka THERESA E. CORRELL	:	
aka THERESA E. LONG	:	
Respondent	:	

AND NOW, comes Debtor, Theresa Elizabeth Oliver, by and through her attorney, Gary J.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. The Mortgage speaks for itself. Strict proof is
ded as to the assignment of the mortgage.
5. Admitted.
6. Admitted in part and denied in part. Debtor has no knowledge. Strict proof is
ded. However, it is noteworthy that according to the Proof of Claim filed by Pingora Loan
ng, the balance owed at the time of the filing of the bankruptcy was \$107,092.13.

7. Admitted in part and denied in part. Payments were in forbearance through September 2021. It is admitted that Debtor is in arrears for failure to make payments from October 2021 to the present. Debtor would like to apply for a loan modification. Alternatively, Debtor offers to cure the post-petition arrearage, including all payments for which there was a forbearance, through an Amended Plan.

8. Admitted in part and denied in part. See Debtor's response to paragraph 7.

9. Denied. Movant is provided adequate protection through regular post-petition monthly payments. To the extent that the post-petition payments are in arrears, Debtor will make an offer in the near future to bring same current.

10. Denied. Movant is not entitled to fees and costs since the amount of Movant's claim exceeds the fair market value of the property. 11 U.S.C. § 506(b), United Savings Association v. Timbers of Inwood Forest Assocs., Ltd., 484 U.S. 365 (U.S. Supreme Court 1988).

11. Denied. The issue of any and all fees owed pursuant to subject motion should be resolved by the Court at this time.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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Attorney for Debtor

DATED: 2-11-22

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF FREEDOM MORTGAGE CORPORATION FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

REBECCA A. SOLARZ, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

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For Debtor

DATED: 2/11/2022